

# CAPES SOKOL

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Regional Freedom of Information Officer  
U.S. EPA, Region 8  
1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone: (303) 312-6306

**Re: FOIA Request for Records Relating to Dr. Richard DeGrandchamp**

Dear Sir or Madam:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, please forward to my attention any and all documents, correspondence, and information relating to the investigations involving Dr. Richard DeGrandchamp ("Dr. DeGrandchamp") including the following:

- A. Copies of any and all written or electronic documents, correspondence, and information relating to Dr. DeGrandchamp providing toxicological expertise on the U.S. Magnesium Corporation (MagCorp) Superfund Site in Utah, which was alleged to be contaminated with PCBs and dioxins, on behalf of the Department of Justice and EPA Region 8. This request includes, but is not limited to, any and all reports, memoranda, studies, and notes relating to (1) toxicological evaluations of workers' health and exposure conditions based on their occupational responsibilities within the plant, (2) efforts to collaborate with Occupational Safety and Health Administration (OSHA), National Institute for Occupational Safety and Health (NIOSH), and EPA toxicologists and physicians to design and implement a medical surveillance program in which blood samples and employee coveralls were collected to determine the extent of dioxin and PCB exposure, (3) work protection plans prepared and/or submitted to attenuate exposures, and (4) efforts to use dioxin levels measured in contaminated overalls to assess exposure to family members to high cancer risk and reproductive effects. In an effort to facilitate information gathering for this request, the case was *US v. Magnesium Corporation of Am.*, 616 F.3d 1129 (10th Cir. 2010) (No. 08-4185); see also *US v. Magnesium Corporation of Am.*, 2007 WL 3046294 (D. Utah 2007), and the Department of Justice attorneys (Env. & Natural Resources Div.) were Robert H. Oakley, John C. Cruden, Lisa Jones and David Street.

This request includes the following categories of information:

1. Transcripts of hearings, depositions, and/or trial testimony of Dr. DeGrandchamp;
2. Statements, interrogatories, declarations, and/or affidavits of Dr. DeGrandchamp;
3. Draft and final reports – including progress reports, consultant reports, and/or expert reports authored by Dr. DeGrandchamp;
4. Draft and final protocols involving Dr. DeGrandchamp's work;
5. Communications including letters, emails, and/or phone records – to / from Dr. DeGrandchamp and when he was copied;
6. Invoices and/or bills related to Dr. DeGrandchamp's work;
7. Photographs and/or videos pertaining to Dr. DeGrandchamp's testimony or work;
8. Documentation of site visits and/or inspections;
9. Internal memoranda, emails, and/or correspondence pertaining to the government's decision to retain Dr. DeGrandchamp.

In order to help you to determine my status to assess fees, you should know that I am an attorney for a public corporation and am seeking information for use on behalf of the corporation's business. To the extent these documents are available on CD or electronically, I prefer to receive them in that format. If costs associated with this request will exceed \$500.00, please notify me with an estimate; I will promptly respond regarding incurring the additional costs.

Thank you in advance. If you have any questions or concerns, please contact me via e-mail or via telephone at the information provided above.

Sincerely,



Michael W. Cromwell  
Attorney